

EXHIBIT 8

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Declaration of Paul F. Mutty

I, Paul F. Mutty, declare as follows:

1. I am currently the interim general counsel at Starbucks Coffee Company, and have worked at Starbucks for 19 years.
2. Since 1971, Starbucks Coffee Company has been committed to ethically sourcing and roasting high-quality arabica coffee. Today, with more than 25,000 stores in 75 countries around the globe, Starbucks is the premier roaster and retailer of specialty coffee in the world. Through our unwavering commitment to excellence and our guiding principles, we bring the unique Starbucks Experience to life for every customer through every cup.
3. Within the United States, Starbucks has over 8,000 company operated stores, and we employ over 180,000 partners (employees). We are proud of the fact that our partners reflect the diverse communities we serve. Inclusion and humanity are fundamental to who we are as a company and to how we approach our communities. We strive to be a place where everyone, from our partners to our customers, feels welcome and valued.
4. Today, more than 43% of Starbucks partners in the United States self-identify as minorities, including more than one in five who identifies as Hispanic or Latino. As a result of the increasingly diverse labor market, we will likely be a “majority minority” company within a few years. While young people from across the globe benefit from Deferred Action for Childhood Arrivals (DACA), the vast majority are youth who identify as Hispanic or Latino. In part because this population reflects a significant number of our partners, we support the young women and men – the “Dreamers” – who are part of the DACA program.
5. Nearly three quarters of a million hardworking youth are contributing to our communities and our economy because of the DACA program. DACA recipients must satisfy strict requirements, including a background check, attending school or having a GED or military service, and applying for work authorization. More than 91 percent of DACA recipients are now employed, contributing billions to our economy and our communities. Of those currently in school, more than 70 percent are pursuing a

1 bachelor's degree or higher. One recent study estimated that removing DACA workers
 2 would represent a loss of \$460.3 billion to the U.S. GDP over a decade. Indeed, we
 3 know that immigrants are twice as likely to start a new business than native born
 4 citizens and even 8 to 10 percent of undocumented immigrants do so. More than 40
 5 percent of Fortune 500 companies were started by an immigrant or the child of an
 6 immigrant. They represent the values of hard work, patriotism and hope that define
 America. They are our future. At Starbucks, we are proud to call them our partners.

7 6. We support bipartisan efforts to secure the future of Dreamers and the promise of
 8 America. On behalf of Starbucks, our founder and Chairman Howard Schultz wrote
 9 earlier this year on this matter to U.S. Senators Lindsey Graham and Richard Durbin.
 10 Last week, our CEO Kevin Johnson signed a pledge with many other companies to
 11 stand with Dreamers. We take these steps not only on behalf of the Dreamers we
 12 employ, but also on behalf of all our partners across the country who have come to
 expect Starbucks to be a responsible and inclusive employer.

13 7. Starbucks reimburses partners for the biennial fee required to stay in the DACA
 14 program. As of today, we are currently aware of at least 84 Starbucks partners who
 15 have sought reimbursement for the DACA fee. This is merely the number of partners
 16 who have sought reimbursement for the fee – the total of DACA partners is likely
 17 substantially more. These partners are employed in 18 states across the country,
 18 including the states of Washington and New York. They are contributing to our efforts
 19 to hire and create pathways for 100,000 opportunity youth. Our DACA partners include
 20 some who are the first in their families to attend college. Others serve on our
 21 Opportunity Youth Leadership Council. Their input to the Council ensures that we have
 22 a better understanding of how to attract and retain talent from minority communities
 23 and how best to employ the strength that these resilient young individuals bring to our
 workforce. We are a better company because of their contributions.

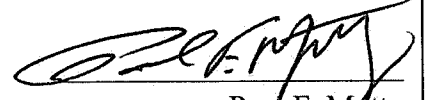
24 8. Having DACA partners supports the kind of diverse and creative workplace we seek to
 25 create and sustain at Starbucks. We recruit people to work where they live so we can
 26 reflect our community, creating meaningful connections with customers whose loyalty
 and repeat business drive our growth. Dreamers who have gained employment under

DACA represent so many of our customers – customers who either are immigrants themselves or the children, grandchildren, or friends of immigrants. We want to see these Dreamers benefit in ways our other partners have, through in-store training, covered health care, and, we hope, fully-funded access to higher education through our partner Arizona State University. We have seen through our hiring commitments to Opportunity Youth, Veterans & Military Spouses, and Refugees, how providing people with options for professional growth leads to workforce stability and lower turnover in a tight labor market. Our goal is to embrace and employ the next generation of diverse talent, which includes our current and future DACA partners.

9. In addition to working at Starbucks, our DACA partners are going to school, taking care of their families, and working toward realizing their own American dream. Our goal is that they feel as welcome and included as any other partner, and we strive to provide them the same opportunities. That is why we reimburse them for the biennial fee they must pay to stay in the program and why we have offered DACA-related services at our Opportunity Youth fairs. Still, we know this population faces many barriers, even with DACA. For example, legal impediments prohibit our DACA partners from taking advantage of our college tuition program with Arizona State University. It is thus critical that we voice our support and concern for these special young women and men. Without the ability to live lawfully and work in this country, hundreds of thousands of patriotic young people will be pushed back underground, including current Starbucks partners, unable to serve their families, their communities, our economy and, most importantly, their own futures. The impact of any changes restricting or ending the DACA program would have far-reaching negative implications well beyond those who participate in the program.
10. Starbucks will continue to stand with the hundreds of thousands of Dreamers impacted by today's announcement, including those we are proud to call Starbucks partners. These young people are in America through no fault of their own. They are contributing to their community and to the economy, and this is their home. Forcing them to leave is unacceptable.

1 I declare under penalty of perjury under the laws of the United States of America that
2 the foregoing is true and correct to the best of my knowledge.

3 Respectfully submitted,

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5 Paul F. Mutty

6 September 5, 2017
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